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Respond to NJ ☐

NY ☒

August 18, 2017

By ECF

Honorable Katherine Polk Failla
U.S. District Court, S.D.N.Y.
500 Pearl Street
N.Y., N.Y. 10019-9601

**Re: *Keyu Long v. Amway Corp.*
1:17-CV-2613 (KPF)**

Dear Judge Failla:

I am counsel to the Plaintiff in the above-captioned matter, Keyu Long (a/k/a “Adeline Wang” or “Plaintiff”).

As the Court is aware, the defendant, Amway Corp. (“Amway”), has made a motion to compel arbitration (“Motion”). In that respect, the briefing schedule, which was extended once upon mutual application of the parties, called for Amway to submit its Motion by July 31st, and Plaintiff to submit her opposition by August 31, 2017.

Plaintiff currently is in China, and was expected to return to the U.S. by mid-August. However, she apparently has experienced a serious sickness or injury—I am not sure which---as can be seen from her email to me at 9:24 p.m. of August 15, 2017, which I first saw on

August 18, 2017

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Wednesday morning. Without waiving any Attorney-Client Privilege as to communications between client and counsel, I have appended Adeline's email for the Court's edification. According to an intermediary who apparently communicates with Adeline through texting, her reference to "...just back home yesterday" refers to her home in China.

Her suggestion to try and communicate through "wechat", whatever that may be, is not really possible since I must meet with her, face to face, along with someone who can interpret, as Adeline's English, which has markedly improved over the years since I have known her, still is questionable enough that I must be sure that we are on the same page when I am drafting a declaration in support of her opposition and discussing documents appended to Amway's Motion. In addition, the 13 hour time difference coupled with attempting to communicate by phone make it extremely difficult as one can imagine.

I have asked the intermediary who apparently "wechats" with Adeline to have her email or call me in the morning tomorrow, or even Sunday, so I can determine exactly when she will return to the United States which, depending on her ability to travel, I would expect to be before the end of this month because Adeline has two small girls who attend school here on Long Island and I suspect that they will be going back to school at or around Labor Day.

In that regard, I emailed my adversaries earlier today to request that they agree to an extension until at least the 10th of September, which, at first blush, I thought would give me enough time to respond except for the fact that I have no idea when Adeline will be returning and the intermediary does not know either, or know the extent of her surgery. As I am leaving for a scheduled trip to Italy between the 12th and 22d of September, and have not heard back from either of my adversaries this afternoon, I am requesting an extension of Plaintiff's time to submit opposition until the end of September just to be safe and not have to request another adjournment.

Since the matter remains on hold until the Motion is decided, Amway would in no way be prejudiced by the extension were the Court to grant it.

Thank you for your attention to the matter.

New York, N. Y.

Yours etc.,

/s/ Louis J. Maione, Esq.

cc: Counsel by ECF and email

Adeline Long <adeline.long@yahoo.com>

Tue, Aug 15, 2017 at 9:27 PM

Reply-To: Adeline Long <adeline.long@yahoo.com>

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To: "Louis J. Maione" <louisjmaione3@gmail.com>

Hi Louis

I got a serious cerjury have been staying inhospital for three weeks just back home yesterday, Iwill ask henny creat a chat group so three of us can be on the wechat. so we can talk more detals

I add you as friend on wechat, pla add me or agree on my adding.

thanks

[Quoted text hidden]

Thu, Aug 17, 2017 at 8:58 PM

To: "Louis J. Maione" <louisjmaione3@gmail.com>

Cc: Petek Gunay <petekgunay@aol.com>, Adeline Long <adeline.long@yahoo.com>, LongKeyu <adeline1119@hotmail.com>

<https://mail.google.com/mail/u/0/?ui=2&ik=41ba49bf61&jsver=z3kHg2VWLDs.en.&view=pt&search=inbox&th=15df58b50e8622ce&siml=15de683864f9...> 1/2